

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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LUIS G. AVILA,

Plaintiff,

-against-

120 LIBERTY STREET LLC, et al.

Defendants.

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21 MC 102 (AKH)

07-CV-450 (AKH)

**NOTICE OF ADOPTION
OF ANSWER TO THE
MASTER COMPLAINT**

PLEASE TAKE NOTICE, that defendants, CAMMEBY'S MANAGEMENT COMPANY, LLC and 32-42 BROADWAY OWNER LLC, by their attorneys, CONWAY, FARRELL, CURTIN & KELLY, P.C., as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer and affirmative defenses to the Master Complaint, dated August 3, 2007, which was filed in the matter of: In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

PLEASE TAKE FURTHER NOTICE, that to the extent the Defendants' Answer to the Master Complaint does not comprehensively address every specific allegation within the Check-Off Complaint in the above captioned matter, Defendants, CAMMEBY'S MANAGEMENT COMPANY, LLC and 32-42 BROADWAY OWNER LLC, deny knowledge or information sufficient to form a belief as to the truth of each such allegation.

WHEREFORE, the defendants, CAMMEBY'S MANAGEMENT COMPANY, LLC and 32-42 BROADWAY OWNER LLC, demand judgment dismissing

the above-captioned action as against them, together with their costs and disbursements, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
September 25, 2007

Yours, etc.
**CONWAY, FARRELL, CURTIN
& KELLY, P.C.**

By: /s/ Kristin G. Shea
KRISTIN G. SHEA (KS2897)
Attorneys for Defendants,
**CAMMEBY'S MANAGEMENT COMPANY,
LLC and 32-42 BROADWAY OWNER LLC,**
48 Wall Street, 20th Floor
New York, New York 10005
(212) 785-2929
[*Electronically Filed*]

To:

**WORBY GRONER EDELMAN
& NAPOLI BERN, LLP**
Plaintiffs Liaison Counsel
115 Broadway, 12th Floor
New York, New York 10006

All Defense Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies as follows:

1. I am employed by the law firm of Conway, Farrell, Curtin & Kelly, P.C..
2. On September 25, 2007, I prepared and forwarded copies of the within Notice of Adoption of Answer to the Master Complaint via regular mail upon:

**WORBY GRONER EDELMAN
& NAPOLI BERN, LLP**
Plaintiffs Liaison Counsel
115 Broadway, 12th Floor
New York, New York 10006

3. and caused the document to be electronically mailed via ECF to all defense counsel.
4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

_____/s/ Kristin G. Shea

KRISTIN G. SHEA (KS2897)